

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

CARLOS A GARCIA -PEREZ, ET AL.

Plaintiffs

v.

ALVARO SANTAELLA, ET AL.

Defendants

CIVIL NO. 97-1703(JAG)

**MOTION REQUESTING LEAVE TO FILE UNDER SEAL
AND IN SATISFACTION OF JUDGMENT**

TO THE HONORABLE COURT:

Comes now the Insurers Syndicate for the Joint Underwriting of Medic-Hospital Liability Insurance ("SIMED"), through the undersigned attorneys, and respectfully states and requests as follows:

1. Yesterday, June 27, 2005, SIMED filed a motion under seal in satisfaction of the settlement agreement entered into by the parties and the corresponding judgment entered by this court.

2. Pursuant to the parties' stipulation to keep their agreement confidential, and this Court's previous rulings regarding this matter, SIMED respectfully moves the Court to grant leave to file under the seal the motion mentioned in the previous paragraph.

WHEREFORE, it is respectfully requested from this Honorable Court to grant leave to file under seal the motion set forth above, and to deem SIMED in satisfaction of the judgment entered in the instant case.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, on June 28, 2005.

I HEREBY CERTIFY: That copy of this motion will be served through the ECF/CM system on the following attorneys participants in the system: Pedro J. Cordova-Pelegrina; Gilda Del C. Cruz-Martino; Angel R. De-Corral-Julia; Igor Dominguez-Perez; Andres Guillemard-Noble; Isabel M. Guillen-Bermudez; Jeannette M. Lopez; Alexis D. Mattei-Barrios; Raphael Pena-Ramon; Doris Quinones-Tridas; Ricardo L. Rodriguez-Padilla; Roberto E. Ruiz-Comas; Joan Schlump-Peters; Jaime Sifre-Rodriguez; Pedro Toledo-Gonzalez; Marta E. Vila-Baez; Luis V. Villares-Sarmiento; Jose H. Vivas.

/s/
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